

REMARKS

At the outset, Applicants thank the Examiner for reviewing and considering the pending application. The Office Action dated November 1, 2005 has been received and its contents carefully reviewed.

Applicants also thank the Examiner for conducting a personal interview with Applicants' representative on March 30, 2006. The substance of the interview has been incorporated into the following remarks.

Claims 1, 13, 21, 30, 34, and 39 are hereby amended to enhance the clarity of the claim language without narrowing the scope thereof. Also, claims 25 and 36 are hereby canceled. Further, claims 46-54 are hereby withdrawn, as a result of the restriction requirement. Accordingly, claims 1, 3-6, 8-13, 15-19, 21-27, 30, 32-41, and 46-54 are currently pending. Reconsideration is respectfully requested.

The Office Action includes an objection to claim 25. In view of the cancellation of claim 25, Applicants respectfully submit that the objection is moot and request withdrawal thereof.

Claims 1, 3-6, 8-13, 15-19, 21-27, 30, and 39-41 are rejected under 35 U.S.C. § 112, first paragraph as failing to comply with the written description requirement. In particular, the limitation regarding the percentage amount of silicon material being greater than the percentage amount of foam agent, as recited in claims 1, 13, 22, 30, and 39, is asserted to broaden the original disclosure. Further, the claimed limitations are asserted to be new matter.

Applicants traverse the 35 U.S.C. § 112, first paragraph rejection at least since the claims are clearly supported by the specification. For example, pages 9 and 15 of the specification indicates that a "porous pad is made by mixing silicone with a foam agent to prepare a pad." Additionally, it is clear from the context of the specification that the recitation of a porous pad

containing “approximately 89% silicon, approximately 10% foam agent, and approximately 1% adhesive” serves as a non-limiting, illustrative example, as such disclosure is preceded by the words “in this case.” Moreover, the term, “approximately” indicates that the porous pad is not limited exclusively or precisely to 89% silicon, 10% foam agent, and 1% adhesive. The context of, and example included in, the specification support the claimed limitation of “a percentage amount of silicon [being] greater than a percentage amount of the foam agent” as recited in claims 1, 3-6, 8-13, 15-19, 21-27, 30, and 39-41. In other words, the specification is not as narrowly defined and as limiting as interpreted in the Office Action. That is, the claimed subject matter does not broaden the original disclosure. Furthermore, as the claimed combination of features are supported by the specification, no new matter has been introduced into the claims. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §112, first paragraph.

Claims 1, 3-6, 8-13, 15-19, 21-27, 30, and 32-41 under 35 U.S.C. §103(a) as being unpatentable over *Isohata* (U.S. Patent No. 6,288,489) in view of *Ebihara* (U.S. Patent No. 6,794,026). Applicants respectfully traverse this rejection.

Applicants submit that *Isohata* and *Ebihara*, taken singularly or in combination, fail to disclose the combination of features recited in the claims. For example, *Isohata* and *Ebihara* fail to disclose or suggest at least “a porous pad made of a material that absorbs noise/vibration and conducts heat provided at the display panel, the material including silicon mixed with a foam agent, wherein a percentage amount of silicon is greater than a percentage amount of the foam agent,” as recited in claim 1. Also, *Isohata* and *Ebihara* fail to disclose or suggest, inter alia, “a porous pad made of a material that absorbs noise/vibration and conducts heat positioned between said display panel and said frame, the material including silicon and a foam agent, wherein the percentage amount of silicon material is higher than the percentage amount of the foam agent,”

as recited in claim 13. Further, *Isohata* and *Ebihara* fail to disclose or suggest at least “a porous pad attached between the display panel and the frame, wherein the porous pad includes silicon and an urethane foam, the percentage amount of silicon being larger than the percentage amount of urethane foam,” as recited in claim 22. In addition, *Isohata* and *Ebihara* do not disclose or suggest at least “a double-sided tape for a thermal conduction between the display panel and the porous pad, wherein the percentage of the silicon material is greater than the percentage of the foam agent,” as recited in claim 30. *Isohata* and *Ebihara* fail to disclose or suggest at least “a porous pad located between the circuit board and the back cover, the porous pad including silicon mixed with a foam agent, wherein a percentage amount of silicon is greater than a percentage amount of the foam agent,” as recited in claim 34. Further, *Isohata* and *Ebihara* fail to disclose or suggest at least “a porous pad disposed between the display panel and the frame, the porous pad including an urethane foam and a silicon material, the percentage of silicon material in the porous pad being greater than the percentage of the urethane foam,” as recited in claim 39.

In contrast, *Isohata* discloses a plasma display device that includes an aluminum plate 18. However, the aluminum plate 18, as disclosed by *Isohata*, fails to anticipate or render obvious, a porous pad, as recited in each of the independent claims.

Further, *Ebihara* fails to cure the deficiencies of *Isohata* by, at least, never disclosing whether a percentage amount of silicone is greater or lesser than a percentage amount of foam agent.

Nonetheless, *Ebihara* is relied upon to cure this deficiency when it is alleged that *Ebihara* “discloses that the amount of silicone material may be varied (col. 3, ln. 54-56) and that additional silicone layers may be provided in the porous pad (col. 4, ln. 22-44).” Office Action

at p. 7, ¶ 23. However, the 35 U.S.C. §103(a) rejection set forth in the Office Action does not appreciate the full meaning of *Ebihara*'s words, which read:

The spongiform radiating element 3 of the invention is composed by impregnating a radiating material 2 in the radiating base material 1 having continuous foams, and the radiating material 2 is radiating gel or radiating grease, and preferably the radiating gel is composed of a silicone gel and a filler, and the filler is powder of high heat conductivity made from alumina, zinc oxide, aluminum hydroxide, silicone carbide, magnesia, boron nitride, etc., and the filler is preferably blended by 200 parts or more by weight to 100 parts by weight of silicone. [*Ebihara* at col. 3:46-56]

Thus, *Ebihara* states that its spongiform radiating element is comprised of: 1) a radiating base material; and 2) a radiating material. The radiating base material is comprised of a continuous foam. The radiating material, however, is comprised of two components: silicone gel and filler. *See id.* The section of *Ebihara* referenced in the Office Action indicates a preferable mixture of *silicone gel to filler in the second component* (the radiating material) of the spongiform radiating element. *Ebihara*, however, never discloses whether a percentage amount of silicone in the *second component* (the radiating material) of its spongiform radiating element is greater or lesser than a percentage amount of foam agent in the *first component* (radiating base material) of its spongiform radiating element. Thus, there is no indication or suggestion in *Ebihara* that a percentage amount of silicone is greater than, or lesser than, a percentage amount of urethane foam in *Ebihara*'s spongiform radiating element.

Accordingly, Applicants submit that claims 1, 13, 22, 30, 34, and 39 are patentable and request that the rejection be withdrawn. Likewise, claims 3-6, 8-12, 15-19, 21-23, 24-27, and 32-33, 35-38, and 40-41, which variously depend from claim 1, 13, 22, 30, 34, or 39 are also patentable for at least the same reasons as discussed above.

Applicants believe the foregoing amendments place the application in condition for allowance and early, favorable action is respectfully solicited. as discussed above.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address. as discussed above.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

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Respectfully submitted,

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